

**Edwin A. Harnden**, OSB No. 721129  
eharnden@barran.com

**Bruce T. Garrett**, OSB No. 213430  
bgarrett@barran.com  
601 SW Second Ave., Suite 2300  
Portland, Oregon 97204-3159  
Telephone: (503) 228-0500  
Facsimile No.: (503) 274-1212

Attorneys for Non-Party Advance Local Media LLC d/b/a Oregonian Media Group (The Oregonian)

UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
PORTLAND

KELLY CAHILL, et al,

**3:18-cv-01477-JR**

Plaintiffs,

v.

NIKE, INC., an Oregon Corporation,

Defendants.

**SUPPLEMENTAL DECLARATION  
OF MATTHEW KISH IN SUPPORT  
OF ADVANCE LOCAL MEDIA  
LLC, D/B/A OREGONIAN MEDIA  
GROUP'S (THE OREGONIAN)  
EMERGENCY MOTION TO  
VACATE THE MAGISTRATE  
JUDGE'S ORDER, OR IN THE  
ALTERNATIVE, STAY  
PROCEEDINGS PRIOR TO  
JANUARY 31, 2024, FRCP 72**

---

I, Matthew Kish, declare as follows:

1. Prior to my meeting with Ms. Salerno Owens on January 19, 2024, pursuant to standard journalistic practices, I spoke with a person who I understood not to be a Plaintiff in the *Cahill v. Nike* lawsuit, but who was making her own previously unknown allegation of sexual harassment at Nike. I referenced this person in my first declaration as “a current or former employee of Nike.”

2. On January 17, 2024, pursuant to standard journalistic practices, I contacted Ms. Laura Salerno Owens because I wanted comment from an attorney representing individuals making similar allegations in the *Cahill v. Nike* lawsuit. Ms. Salerno Owens agreed to meet me on January 19, 2024.

I hereby declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to penalty for perjury.

DATED: 2/13/2024 | 10:41 AM PST  
\_\_\_\_\_

DocuSigned by:

Matthew Kish

0FF7000BA284463

Matthew Kish